

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

3G LICENSING, S.A.,  
KONINKLIJKE KPN N.V., and  
ORANGE, S.A.,

Plaintiffs,

v.

HTC Corporation,

Defendant.

C.A. No. 17-cv-83-GBW

**JURY TRIAL DEMANDED**

**[PLAINTIFFS' PROPOSED] VERDICT FORM**

**Instructions:** When answering the following questions and completing this Verdict Form, please follow the directions provided throughout the form. Your answer to each question must be unanimous. Please refer to the Final Jury Instructions for guidance on the law applicable to each question.

In this Verdict Form, “3G Licensing” refers to 3G Licensing, S.A. and “HTC” means defendant HTC Corporation.

**QUESTIONS AND ANSWERS****I. Infringement****A. U.S. Patent No. 6,856,818 (“the ’818 Patent”)**

1. Has 3G Licensing proven by a preponderance of the evidence that HTC directly infringed any of the following claims of the ’818 Patent?

*For each asserted claim please check “Yes” or “No” below. A “Yes” answer is a finding for 3G Licensing. A “No” answer is a finding for HTC.*

	Yes	No
a. Claim 18	_____	_____
b. Claim 19	_____	_____
c. Claim 22	_____	_____
d. Claim 23	_____	_____

2. Has 3G Licensing proven by a preponderance of the evidence that HTC induced the infringement of any of the following claims of the ’818 Patent?

*For each asserted claim please check “Yes” or “No” below. A “Yes” answer is a finding for 3G Licensing. A “No” answer is a finding for HTC.*

	Yes	No
a. Claim 18	_____	_____
b. Claim 19	_____	_____
c. Claim 22	_____	_____
d. Claim 23	_____	_____

**B. U.S. Patent No. 7,995,091 (“the ’091 Patent”)**

3. Has 3G Licensing proven by a preponderance of the evidence that HTC directly infringed any of the following claims of the ’091 Patent?

*For each asserted claim please check “Yes” or “No” below. A “Yes” answer is a finding for 3G Licensing. A “No” answer is a finding for HTC.*

	Yes	No
a. Claim 1	_____	_____
b. Claim 2	_____	_____
e. Claim 6	_____	_____
f. Claim 7	_____	_____

***If you answered “No” to all of these Questions 1–3 do NOT answer any other questions, leave the remaining questions unanswered and go to the final page of the Verdict Form.***

**II. Invalidity**

4. Has HTC proven by clear and convincing evidence that any of the following claims of the '818 Patent is invalid?

*For each asserted claim please check "Yes" or "No" below. A "Yes" answer is a finding for HTC. A "No" answer is a finding for 3G Licensing.*

	Yes	No
a. Claim 18	_____	_____
b. Claim 19	_____	_____
c. Claim 22	_____	_____
d. Claim 23	_____	_____

5. Has HTC proven by clear and convincing evidence that any of the following claims of the '091 Patent is invalid?

*For each asserted claim please check "Yes" or "No" below. A "Yes" answer is a finding for HTC. A "No" answer is a finding for 3G Licensing.*

	Yes	No
a. Claim 1	_____	_____
b. Claim 2	_____	_____
e. Claim 6	_____	_____
f. Claim 7	_____	_____

*Answer Question 6 only if you found one or more of the asserted claims to be infringed in Questions 1–3 and you did not find the infringed claim(s) to be invalid in Questions 4–5.*

**III. Damages**

6. What is the total amount that 3G Licensing has proven by a preponderance of the evidence that it is entitled to be paid to fairly compensate it for HTC's infringement through December 2018?

\$ \_\_\_\_\_

*Answer Question 7 only if you found one or more of the asserted claims to be infringed in Questions 1–3 and you did not find the infringed claim(s) to be invalid in Questions 4–5.*

**IV. Willfulness**

7. Has 3G Licensing proven by a preponderance of the evidence that HTC willfully infringed **any** asserted claim?

*A “Yes” answer is a finding for 3G Licensing. A “No” answer is a finding for HTC.*

Yes

No

\_\_\_\_\_

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**Unanimous Verdict**

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Date

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Foreperson

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Juror

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Juror

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Juror